

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-362-E**

IN RE:)	
The Request of Beulah Solar, LLC to Toll)	
the Deadline for Milestone Payment #1)	MOTION TO MAINTAIN
)	STATUS QUO
)	
)	
Movant,)	
)	
)	

INTRODUCTION

Beulah Solar, LLC, (hereinafter as, “Beulah Solar”, or “Movants”), hereby moves the Public Service Commission of South Carolina (hereinafter as, “Commission”), to maintain the status quo between Movant and South Carolina Electric & Gas, Company (hereinafter as, “SCE&G”), inclusive as of the date of this filing, going forward and relating back to the filing of a Request by Beulah Solar, of even date. That Request is incorporated herein by reference, as if set forth verbatim.

MOTION TO MAINTAIN STATUS QUO

Movant moves this Commission to maintain the status quo, between the Movant and SCE&G, inclusive as of the date of this filing. Namely, the requirement under Appendix “4” of the Interconnection Agreement dated September 24, 2018 between Beulah Solar and SCE&G, which requires Movant to make a substantial payment equal to one-half of the estimated interconnection charges, by November 20, 2018. This Motion should be read in harmony and in light of Movant’s Request filed on even date, which asks this Commission to toll the Deadline for Milestone Payment #1, until the first business day after January 1, 2019.

There is substantial economic and regulatory uncertainty concerning the long-term future of SCE&G, arising from the many issues raised in Docket Nos. 2017-370-E, 2017-207-E, and 2017-305-E (the “Consolidated Dockets”), currently pending before this Commission. Beulah Solar is a wholly owned subsidiary of Cypress Creek Renewables, LLC (hereinafter as, “Cypress Creek”) and Cypress Creek’s financing parties are understandably unwilling to provide financing for the Milestone Payment #1, until some of this uncertainty is resolved. An extension of the Milestone Payment #1 deadline until January 2, 2019, (the first business day after January 1, 2019), would provide a reasonable amount of time after this Commission issues a ruling in the Consolidated Dockets, for Cypress Creek to assess the impact of any such ruling and to obtain financing.

WHEREFORE, Movant, based on the foregoing, moves to maintain the status quo, between the Movant and SCE&G, inclusive as of the date of this filing, going forward and in the light of the Request by Movant filed with this Commission, on even date. Namely, this Commission should Order that, an extension of the Milestone Payment #1 deadline be made, until January 2, 2019, (the first business day after January 1, 2019), which would provide a reasonable amount of time after this Commission issues a ruling in the Consolidated Dockets, for Cypress Creek to assess the impact of any such ruling and to obtain financing; and

FOR SUCH OTHER AND FURTHER RELIEF AS THIS COMMISSION MAY DEEM JUST AND PROPER.

This 19th day of November, 2018.

November 19, 2018
Columbia, South Carolina

Respectfully Submitted,

/s/Richard L. Whitt,

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